

## **EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

OCEAN SEMICONDUCTOR LLC,

Plaintiff,

v.

WESTERN DIGITAL TECHNOLOGIES,  
INC.,

Defendant.

Civil Action No. 6:20-cv-1216-ADA

**JURY TRIAL DEMANDED**

**DEFENDANT WESTERN DIGITAL TECHNOLOGIES, INC.'S  
SECOND SET OF INTERROGATORIES (NOS. 9 TO 12)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Western Digital Technologies, Inc. hereby requests that Plaintiff Ocean Semiconductor LLC provide written responses to these interrogatories within thirty (30) days of service.

Defendant incorporates by reference the definitions and instructions from Defendant Western Digital Technologies, Inc.'s First Set of Interrogatories (Nos. 1 to 8). In addition, "Fullbrite" means Fullbrite Capital Partners, LLC and all of its predecessors and successors, all past and present parents, subsidiaries, and divisions of Fullbrite Capital Partners, LLC, and all past and present directors, officers, employees, agents, and representatives (including consultants and attorneys) of Fullbrite Capital Partners, LLC.

**INTERROGATORIES**

9. Identify all shareholders, members, directors, or officers of Ocean, and the role of each since Ocean was formed.

10. Identify all facts on which you intend to rely to demonstrate that the corporate veil should not be pierced should the Court award WDT its attorneys' fees and costs in this Action.

11. Identify all facts on which you intend to rely to demonstrate that Ocean is not the

alter ego of Fullbrite should the Court award WDT its attorneys' fees and costs in this Action.

12. For each asserted claim for which You assert infringement under the doctrine of equivalents, identify under the ensnarement doctrine a hypothetical claim that You allege covers the accused process, and describe in detail why each such claim is not invalid over the prior art.

Dated: March 25, 2022

Respectfully submitted,

SHEARMAN & STERLING LLP

By: /s/ L. Kieran Kieckhefer

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*Attorneys for Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on March 25, 2022, all counsel of record who have appeared in the above-captioned case were served with a copy of the foregoing by email.

/s/ Shiina Akasaka  
Shiina Akasaka  
Litigation Case Manager